

**THE THATER LAW GROUP, P.C.**

M. Lani Esteban-Trinidad

Nevada Bar No. 006967

6390 W. Cheyenne Ave., Ste. A

Las Vegas, Nevada 89108

Telephone: (702) 736-5297

Fax: (702) 736-5299

E-Mail: lani@thaterlawgroup.com

Attorney for Plaintiffs

MANUEL VERMA & DUANE USHIJIMA

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MANUEL VERMA, an individual, DUANE  
USHIJIMA, an individual,

Plaintiffs,

vs.

KEOLIS TRANSIT AMERICA, LLC; DOES 1  
through 10 inclusive; ROES  
CORPORATIONS/ENTITIES 1 through 10  
inclusive; and REGIONAL  
TRANSPORTATION COMMISSION OF  
SOUTHERN NEVADA; DOES 1 through 10  
inclusive; ROES CORPORATIONS/ENTITIES  
1 through 10 inclusive,

Defendants.

Case No. 2:16-cv-2037-JAD-NJK

**STIPULATION AND ORDER TO EXTEND  
TIME FOR PLAINTIFFS MANUEL VERMA  
AND DUANE USHIJIMA TO FILE A  
RESPONSIVE PLEADING TO DEFENDANTS'  
MOTION TO DISMISS PLAINTIFF'S  
COMPLAINT**

**(FIRST REQUEST)**

Plaintiffs MANUEL VERMA and DUANE USHIJIMA ("Plaintiffs"), by and through their counsel of record, The Thater Law Group, P.C. and Defendants KEOLIS TRANSIT AMERICA, LLC ("Keolis") and REGIONAL TRANSPORTATION COMMISSION OF SOUTHERN NEVADA ("RTC"), by and through their respective counsel Jackson Lewis, P.C., hereby stipulate and agree to extend the time for Plaintiffs to file a responsive pleading to Defendants Keolis and RTC's Motion to Dismiss from October 28, 2016 up to and including November 11, 2016.

1 The parties seek the requested extension because the current date for Plaintiff to respond to the  
2 pending defense Motion falls on Friday, October 28, 2016, which is Nevada Day, with Plaintiff's  
3 counsel's staff off from work in observance of the state holiday and given Plaintiff's counsel's multiple  
4 coinciding deadlines in pending State Court cases during that shortened work week, Plaintiff's counsel  
5 requires the additional time to respond to defense Motions.  
6

7 This stipulation and order is sought in good faith and not for the purpose of delay.

8 DATED this 20<sup>th</sup> day of October, 2016.  
9

10 **THE THATER LAW GROUP, P.C.**

**JACKSON LEWIS, P.C.**

11 BY: /s/ M. Lani Esteban-Trinidad

BY: /s/ Paul Trimmer

12 M. Lani Esteban-Trinidad, Esq.

Paul Trimmer, Esq. NV Bar No. 9291

13 Nevada Bar No. 6967

Dione C. Wrenn, Esq. NV Bar No. 13285

14 6390 West Cheyenne Ave., Suite A

3800 Howard Hughes Parkway, Suite 600

Las Vegas, NV 89108

Las Vegas, NV 89169

*Attorney for Plaintiffs*

*Attorneys for Defendants*

15  
16  
17 **ORDER**

18 IT IS SO ORDERED.

19  
20  
21   
UNITED STATES DISTRICT JUDGE

Dated: October 21, 2016.  
22  
23  
24  
25  
26  
27  
28